

Lee (A)

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA



COMPLAINT UNDER CIVIL RIGHTS ACT 42 U.S.C. § 1983

Action Number 1:13CV540 GBL/IDD
(To be supplied by the Clerk, U.S. District Court)

Please fill out this complaint form completely. The Court needs the information requested in order to assure that your complaint is processed as quickly as possible and that all your claims are addressed. Please print/write legibly or type.

I. PARTIES

A. Plaintiff:

1. (a) DAVID GRAHAM GOODMAN pro se (b) 11-3987
(Name) (Inmate number)
CHES. CORR. CTR.
(c) 400 ALBEMARLE DRIVE
(Address)

CHESAPEAKE, VA. 23322-5504

Plaintiff MUST keep the Clerk of Court notified of any change of address due to transfer or release. If plaintiff fails to keep the Clerk informed of such changes, this action may be dismissed.

Plaintiff is advised that only persons acting under the color of state law are proper defendants under Section 1983. The Commonwealth of Virginia is immune under the Eleventh Amendment. Private parties such as attorneys and other inmates may not be sued under Section 1983. In addition, liability under Section 1983 requires personal action by the defendant that caused you harm. Normally, the Director of the Department of Corrections, wardens, and sheriffs are not liable under Section 1983 when a claim against them rests solely on the fact that they supervise persons who may have violated your rights. In addition, prisons, jails, and departments within an institution are not persons under Section 1983.

B. Defendant(s):

1. (a) KENNETH W. STOLLE (b) SHERIFF/HIGH CONSTABLE
(Name) (Title/Job Description)
(c) 2501 JAMES MADISON BLVD.
(Address)

VIRGINIA BEACH, VA 23456



2. (a) JOHN DOE (Name) (b) SERGEANT / SHERIFFS Deputy (Title/Job Description)
- (c) 2501 JAMES MADISON BLVD. (Address)
- VIRGINIA BEACH, VA. 23456
3. (a) JOHN DOE (Name) (b) CORPORAL / SHERIFFS Deputy (Title/Job Description)
- (c) 2501 JAMES MADISON BLVD. (Address)
- VIRGINIA BEACH, VA 23456

If there are additional defendants, please list them on a separate sheet of paper. Provide all identifying information for each defendant named.

Plaintiff MUST provide a physical address for defendant(s) in order for the Court to serve the complaint. If plaintiff does not provide a physical address for a defendant, that person may be dismissed as a party to this action.

II. PREVIOUS LAWSUITS

- A. Have you ever begun other lawsuits in any state or federal court relating to your imprisonment? Yes ☐ No ☒
- B. If your answer to "A" is Yes: You must describe any lawsuit, whether currently pending or closed, in the space below. If there is more than one lawsuit, you must describe each lawsuit on another sheet of paper, using the same outline, and attach hereto.

1. Parties to previous lawsuit: NONE

Plaintiff(s) N/A

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the county):

N/A

3. Date lawsuit filed: N/A

4. Docket number: N/A

ADDITIONAL DEFENDANTS

4. (A) JOHN DOE (NAME) (b) DEPUTY SHERIFF TITLE/JOB DESCRIPTION

(C) 2501 JAMES MADISON BLVD. (ADDRESS)
VIRGINIA BEACH, VIRGINIA 23456

5. (A) JANE DOE (NAME) (b) DEPUTY SHERIFF TITLE/JOB DESCRIPTION

2501 JAMES MADISON BLVD. (ADDRESS)
VIRGINIA BEACH, VA 23456

5. Name of Judge to whom case was assigned: N/A

N/A

6. Disposition (Was case dismissed? Appealed? Is it still pending? What relief was granted, if any?):

N/A

N/A

III. GRIEVANCE PROCEDURE

A. At what institution did the events concerning your current complaint take place: _____

VIRGINIA BEACH CORR. CTR. 2501 JAMES MADISON BLVD. VA. BEACH, VA. 23456

B. Does the institution listed in "A" have a grievance procedure? Yes [☐] No [☒] UNKNOWN

* SEE ATTACHED SHEET

C. If your answer to "B" is Yes:

1. Did you file a grievance based on this complaint? Yes [☒] No [☐] UNKNOWN

* SEE ATTACHED SHEET

2. If so, where and when: CHESAPEAKE CORR CTR. NOVEMBER 8TH 2012
400 ALBEMARLE DR. CHES. VA. 23322

3. What was the result? UNKNOWN, INTERNAL AFFAIRS / SHERIFFS DEPT.

VA. BEACH 2501 JAMES MADISON BLVD. VA. BEACH, VA. 23456

4. Did you appeal? Yes [☐] No [☐]

5. Result of appeal: N/A * SEE ATTACHED SHEET

D. If there was no prison grievance procedure in the institution, did you complain to the prison authorities? Yes [☒] No [☐]

If your answer is Yes, what steps did you take? FILED INCIDENT REPORT

CHESAPEAKE CORR. CTR. 400 ALBEMARLE DR. CHES. VA. / NOVEMBER 8TH 2012

E. If your answer is No, explain why you did not submit your complaint to the prison authorities:

* SEE ATTACHED SHEET

FOR EXPLANATION

III. GRIEVANCE PROCEDURE

* ANSWERS FOR PROCEDURE *

B. DOES THE INSTITUTION LISTED IN A, HAVE A GRIEVANCE PROCEDURE?

ANSWERS AS FOLLOWS: FOR B, C, D, E.

THIS IS UNKNOWN TO ME. I HAD BEEN TRANSPORTED TO THAT FACILITY, FROM CHESAPEAKE CORRECTIONAL CENTER, THAT MORNING, NOVEMBER 7TH, 2012. FOR A VIOLATION OF PROBATION HEARING, IN CIRCUIT COURT.

THE INCIDENT, HAPPENED ON NOVEMBER 7TH 2012, THE SAME DAY.

WHEN TAKEN TO MEDICAL THAT NIGHT, FOR TREATMENT. I TOLD THE SERGEANT (NAME UNKNOWN), AND THE NURSE ON DUTY (NAME UNKNOWN).

I NEEDED TREATMENT, REQUESTED TO BE TAKEN TO HOSPITAL, REQUEST WAS DENIED! EXPLAINED I AM IN EXTREME PAIN. LATER LOST CONSCIOUSNESS.

I WAS RETURNED TO CHESAPEAKE CORRECTIONAL CENTER, THE MORNING (EARLY), OF NOVEMBER 8TH 2012. I ARRIVED HERE BEFORE SUNRISE THE MORNING OF THE 8TH.

NOTE: IN MEDICAL, TOLD I HAD POSSIBLE CONCUSSION.

David G. Goodman pro-se.
David Graham Goodman pro-se

IV. STATEMENT OF THE CLAIM

State here the facts of your case. Describe how each defendant is involved and how you were harmed by their action. Also include the dates, places of events, and constitutional amendments you allege were violated.

If you intend to allege several related claims, number and set forth each claim in a separate paragraph. Attach additional sheets if necessary.

— DEFENDANT #1 - KENNETH W. STOLLE, SHERIFF/HIGH CONSTABLE

THE FOLLOWING WILL SHOW THAT THE PRACTICES OF THE VIRGINIA BEACH SHERIFFS DEPT., KENNETH W. STOLLE, SHERIFF/HIGH CONSTABLE VIOLATED MY EIGHTH (8TH) AMENDMENT RIGHT.

DEFENDANT #1, KENNETH W. STOLLE, SHERIFF/HIGH CONSTABLE

SHALL BE HEREAFTER REFERRED TO AS DEFENDANT #1,

DEFENDANT NO. 1, "HIS FAILURE TO TRAIN, SUPERVISE OR DISCIPLINE CREATING AND OR ALLOWING AN UNCONSTITUTIONAL POLICY OR CUSTOM."

THE FOLLOWING IS IN SUPPORT OF THOSE FACTS.

ON NOVEMBER 7TH 2012, APPROX 6:00 AM. I WAS TRANSPORTED FROM CHESAPEAKE CORRECTIONAL CENTER, 400 ALBEMARLE DR. CHES. VA. 23322. TO VIRGINIA BEACH CORRECTIONAL CENTER, 2501 JAMES MADISON BLVD. VA. BEACH VA 23456. FOR A VIOLATION OF PROBATION HEARING.

I HAD BEEN ASSURED BY MENTAL HEALTH STAFF, AND PUBLIC DEFENDER, I WOULD BE RETURNED SAME DAY AS I SUFFER FROM P.T.S.D. (POST TRAUMATIC STRESS DISORDER). THE TRANSPORTATION DEPUTY CHECKED WITH HIS CORPORAL UPON OUR ARRIVAL. AGAIN I WAS TOLD NO PROBLEM FOR MY RETURN.

* SEE ATTACHED SHEET

IV STATEMENT OF THE CLAIM (CONTINUED) PAGE 4

I WENT TO COURT, RETURNED TO HOLDING AREA, VA. BEACH CORRECTIONAL CENTER. AT APPROXIMATELY 1:30 PM. OR 1330 HRS. I ASKED DEPUTY DAWSON, WHEN WILL I BE TRANSPORTED BACK? DEPUTY DAWSON STATED TRANSPORT ON THEIR WAY!

I THEN SPOKE TO A SERGEANT, A LIEUTENANT, AND A CAPTAIN, (ALL NAMES UNKNOWN) IN HOLDING AREA, THEY CHECKED SAID I WOULD BE RETURNED FIRST THING IN THE MORNING.

I WAS THEN PLACED IN THE INTAKE AREA ON BENCH AGAIN. I WAS LATER TOLD, GET INTO WHEELCHAIR, GOING TO 2C (MEDICAL), ON FLOOR!

I SAID NO! I CAN'T GET IN FLOOR, SPINAL PROBLEMS. I WAS THEN DRUG INTO HOLDING CELL (INTAKE AREA). UNTIL SHIFT CHANGE, STILL NO MEDICATIONS, NO FOOD, ALL DAY!

NOTE: * I DID NOT RESIST, I SIMPLY RELAXED, LAID FLAT, AND WAS DRAGGED ACROSS CONCRETE FLOOR, INTO HOLDING CELL, VIOLATING MY 8TH AMENDMENT RIGHT, TO BE FREE OF ASSAULT, AND OR BATTERY BY JAIL/PRISON OFFICIALS.

ALLOW THIS ACTION AND THE OTHERS THAT WILL FOLLOW, IN THIS STATEMENT OF FACTS, TO SHOW THAT IT IS "COMMON PRACTICE," FOR THE VIRGINIA BEACH SHERIFF'S DEPARTMENT, TO USE "EXCESSIVE FORCE," IN UNNECESSARY INSTANCES, THEREFORE BEING CONSTRUED AS "MALICIOUS AND SADISTIC," WHICH IS A DIRECT VIOLATION OF EIGHTH AMENDMENT RIGHTS, AS THE DEPUTY COMMITTED A "BATTERY" AS DEFINED IN BLACK'S LAW DICTIONARY 173 (9TH ED. 2009)

THEREFORE I BELIEVE THE DEFENDANT, NO. 1, THE SHERIFF/ITIA CONSTABLE FOR THE CITY OF VIRGINIA BEACH IS LIABLE AS FOLLOWS, 1) FAILURE TO OVERSEE THE PEOPLE WHO CAUSED THE WRONG, SUCH AS BY HIRING UNQUALIFIED PEOPLE OR FAILING TO ADEQUATELY TRAIN STAFF (DEPUTIES).

IV STATEMENT OF THE CLAIM (CONTINUED) PAGE 2

2/ CREATED A Policy, OR Custom that allows the wrong to occur.

DEFENDANT NO. 2 (STATEMENT OF FACT)

SERGEANT JOHN DOE, HERE AFTER REFERRED TO AS DEFENDANT NO. 2.

AS STATED EARLIER ON NOVEMBER 7TH 2012. After my RETURN FROM COURT, AND my discussion with others ABOUT my RETURN to CHESAPEAKE, (OFFICERS, NAMES, UNKNOWN), EXCEPT DEPUTY DAVISON.

I WAS AGAIN PLACED IN THE INTAKE AREA, ON A bench in the Common AREA. (phone access, etc.) Some time passed, DEFENDANT NO. 2 instructed me to get into a wheelchair, I WAS GOING TO 2C (Medical).

I QUESTIONED this, LOWER BUNK? He stated FLOOR! I SAID NO!, SPINAL CONDITIONS/PROBLEMS, CANNOT be ON FLOOR!

I WAS THEN GRABBED BY neck of jumpsuit. I WAS THEN DRUG INTO A Holding CELL (INTAKE AREA) UNTIL shift change. Still NO MEDICATIONS, NO FOOD, All Day!

*NOTE I did NOT resist, I relaxed, Laid Flat AND WAS DRAGGED ACROSS CONCRETE FLOOR INTO Holding CELL. Violating my 8TH Amendment, "TO BE FREE OF ASSAULT AND OR BATTERY by Jail/PRISON OFFICIALS."

FINALLY after laying in the floor some length of time, AS my CANE WAS TAKEN FROM me, AND I could not get UP ON the concrete bench without it. A Sergeant, Sergeant ROLAND (INTAKE), STATED OK! Going to ANOTHER PLACE, No problem!

I WAS THEN Released to DEFENDANTS #3, DEFENDANT #4 AND DEFENDANT #5, AFTER being helped into wheelchair from FLOOR, TO go to UNKNOWN Location KNOWN ONLY AS Medical, told A LOWER BUNK.

IV STATEMENT OF THE CLAIM (CONTINUED) PAGE 5

SLAMMED INTO THE CONCRETE FLOOR, AGAIN AT THAT TIME, HAVING MY NECK STOOD ON, THEN A KNEE PLACED ON MY NECK, I LOST CONSCIOUSNESS.

HE, DEFENDANT NO. 4, WAS IN DIRECT VIOLATION OF MY 8TH AMENDMENT RIGHTS, WHEN HE TOOK PART IN THE ASSAULT AND BATTERY ON MY PERSON AGAIN ACTING "UNDER COLOR OF LAW".

DEFENDANT NO. 5 (STATEMENT OF FACT)

DEPUTY JANE DOE, HEREAFTER REFERRED TO AS DEFENDANT NO. 5.

AGAIN ON NOVEMBER 7TH 2012.

AFTER BEING PLACED INTO A WHEELCHAIR TO GO TO MEDICAL HOUSING, (NUMBER UNKNOWN).

WHILE ACCOMPANYING DEFENDANT NO. 3 AND DEFENDANT NO. 4, WAS DEFENDANT NO. 5

WHEN I BECAME SEPERATED FROM MY WHEELCHAIR?, IN THE HALLWAY AND WAS DRAGGED TO A BARRED CELL/CONCRETE FLOOR, SINK/TOILET COMBINATION ONLY (MEDICAL ISOLATION).

DEFENDANT NO. 5 DID WILLFULLY PARTICIPATE IN THE "ASSAULT AND BATTERY" ~~DEFEND 99~~ COMMITTED ON MY PERSON, THE EVENING OF NOVEMBER 7TH 2012.

BY FORCEFULLY STANDING, KNEELING ON MY NECK DURING THE BATTERY BY HER CO-DEFENDANTS, DEFENDANTS NO. 3 AND DEFENDANT NO. 4.

WHEN I WAS TAKEN INTO THE BARRED CELL, LATER IDENTIFIED AS MEDICAL ISOLATION.

(SEE PICTURES TAKEN BY CHS. CORR. CTR. UPON RETURN TO THIS FACILITY)

SHE ALSO DUG HER FINGER, OR THUMB/ UNKNOWN?, INTO THE PRESSURE POINT,

(SEE PAGE 6) CONTINUED

IV STATEMENT OF THE CLAIM (CONTINUED) page 6

behind my Right EAR, CAUSING "EXTREME PAIN".

AGAIN AS A RESULT OF THIS "EXCESSIVE FORCE" / ASSAULT AND BATTERY, I SHORTLY THEREAFTER LOST OR WAS UNCONSCIOUS.

AGAIN A VIOLATION UNDER 8TH AMENDMENT

IN GENERAL -

ACCORDING TO A WITNESS, I WAS LEFT UNCONSCIOUS IN THE FLOOR, IN A PUDDLE OF BLOOD, FROM MY HEAD, FOR APPROXIMATELY 30 (THIRTY) MINUTES, UNTIL SUCH TIME AS A DEPUTY MADE HIS ROUND. AT THIS TIME A "CODE" WAS CALLED, AND I WAS TAKEN TO MEDICAL FOR TREATMENT.

A SERGEANT AND NURSE BOTH (NAMES, UNKNOWN) WERE PRESENT. IT WAS EXPLAINED TO ME, ~~I~~ HAD A POSSIBLE CONCUSSION, A CUT ABOVE MY LEFT EYE. I STATED I WAS NAUSEOUS, HAD SEVERE NECK AND BACK PAIN, AND REQUESTED TO BE TAKEN TO THE HOSPITAL. MY REQUEST WAS DENIED. TOLD I WOULD BE SEEN BY DOCTOR ON NOVEMBER 8TH, MORNING OF, EXPLAINED I WAS BEING RETURNED TO CHEESAPEAKE CORRECTIONAL CENTER, A.M. WAS RETURNED TO MEDICAL ISOLATION, AND PLACED ON DOUBLE MATS, ON THE FLOOR, WENT THROUGH SHAKEDOWN, EARLY A.M. NOVEMBER 8TH 2012

UPON MY RETURN HERE (CHESA. CORR. CTR.) I REQUESTED A SERGEANT, WAS GIVEN AN INCIDENT REPORT.

SEEN BY NURSE JACOBS AND PHOTOGRAPHED BY A DEPUTY.

IN GENERAL -- (CONTINUED)

SINCE, I HAVE BEEN TAKEN TO OUTSIDE MEDICAL ON MULTIPLE OCCASIONS AND AM AWAITING FURTHER TREATMENT FOR NECK, BACK, AND RIGHT SHOULDER PAIN, AS WELL AS PAIN IN MY LEFT HAND.

I declare UNDER PENALTY OF PERJURY that all foregoing is TRUE AND CORRECT.

David J. Goodman PRO-SE
DAVID GRAHAM GOODMAN PRO-SE

IV STATEMENT OF THE CLAIM (CONTINUED) PAGE 3

DEFENDANT NO. 3 (STATEMENT OF FACT)

CORPORAL JOHN DOE, HEREAFTER REFERRED TO AS DEFENDANT NO. 3.

AGAIN AS STATED WAS PLACED IN A WHEELCHAIR TO GO TO MEDICAL HOUSING. ON THE WAY, I WOUND UP ON THE FLOOR, UNSURE WHAT HAPPENED?

I WAS THEN GRABBED FROM FLOOR, MULTIPLE DEPUTIES, 3 TO 4, FOUR I BELIEVE?, WITH "SEVERE FORCE", I WAS THEN SLAMMED INTO FLOOR BY DEFENDANT NO. 3 CURSED, THEN HANDCUFFED BY DEFENDANT NO. 4. OR DEFENDANT NO. 5? UNKNOWN FOR SURE?, SUSPECT DEFENDANT NO. 4 (DEPUTY JOHN DOE).

I WAS THEN DRAGGED DOWN THE HALLWAY BY DEFENDANT NO. 3 AND DEFENDANT NO. 4, DEPUTY JOHN DOE APPROXIMATELY 100 + YARDS.

I WAS TAKEN TO A BARRED CELL, WITH ONLY A CONCRETE FLOOR, AND A SINK/TOILET COMBINATION, SLAMMED INTO THE FLOOR, SPLITTING MY HEAD OPEN, ABOVE MY LEFT EYE (SEE PICTURES)-WHEN RELEASED, Ches. Sheriff Dept. AND MEDICAL RECORDS.

SLAMMED BY DEFENDANT NO. 3, AND DEFENDANT NO. 4 / DEPUTY JOHN DOE, AGAIN THAT WAS SOME TIME AFTER 6:00 PM / 1800 HRS. TIME UNKNOWN.

AGAIN THIS IS A VIOLATION OF MY EIGHTH (8TH) AMENDMENT RIGHTS, IN FACT COMMITTING, ASSAULT AND BATTERY "UNDER COLOR OF LAW"

I EXPLAINED I HAVE HAD EXTENSIVE NECK SURGERY, "CERVICAL FUSION" (V.A HOSPITAL / MCGUIRE V.A.M.C., RICHMOND, VA. 2003) WITH CARVER DISC AND HARDWARE INSTALLED, AS WELL AS MULTIPLE BACK PROBLEMS.

THIS DID NOT SLOW, OR DISCONTINUE THE ASSAULT AND BATTERY, EVEN AS I DID NE RESIST OR BECOME COMBATIVE, AT ANY

IV STATEMENT OF THE CLAIM (CONTINUED) PAGE 4

I WAS THEN SLAMMED INTO THE FLOOR AGAIN, AT SUCH TIME, AFTER HAVING MY NECK STOOD ON BY DEFENDANT NO. 5, DEPUTY JANE DOE I LOST CONSCIOUSNESS, SHOWING "DELIBERATE INDIFFERENCE".

DEFENDANT NO. 4 (STATEMENT OF FACT)

DEPUTY JOHN DOE, HEREAFTER REFERRED TO AS DEFENDANT NO. 4

AS DESCRIBED PREVIOUSLY, DATE IS NOVEMBER 7TH 2012.

DEFENDANT NO. 4 ACCOMPANIED DEFENDANT NO. 3 AND DEPUTY JANE DOE, DEFENDANT NO. 5, AS I WAS PLACED IN A WHEELCHAIR, DESTINATION MEDICAL (NUMBER UNKNOWN), AFTER THE WHEELCHAIR INCIDENT AS PREVIOUSLY DESCRIBED, I WAS DRAGGED DOWN THE HALL BY DEFENDANT NO. 4, AGAIN WITH THE HELP OF DEFENDANT NO. 3. AGAIN UPON MY ARRIVAL, HE, DEFENDANT NO. 4, HELPED TO SLAM ME INTO THE FLOOR, (BARE CONCRETE), IN A BARRED CELL WITH ONLY A SINK/TOILET COMBINATION, LATER DEFINED AS MEDICAL ISOLATION, BY OTHER STAFF/DEPUTIES. (SEE PICTURES TAKEN BY CHEMUNKE CORR. CTR. DEPUTIES) UPON RETURN TO THE FACILITY).

DEFENDANT NO. 4, HE STOOD ON MY BACK WHILE DEFENDANT NO. 3, UN-HANDCUTTED ME WHILE LYING ON MY STOMACH. DURING THIS TIME DEFENDANT NO. 5, DEPUTY JANE DOE STOOD ON MY NECK AND THEN PLACED HER KNEE ON MY NECK, AND HAND, GRINDING MY FACE IN THE FLOOR.

AGAIN I EXPLAINED I HAVE HAD "CERVICAL FUSION" AND HARDWARE INSTALLED IN MY NECK, AND WAS NOT RESISTING OR ASSAULTIVE OR COMBATIVE. I WAS AT THAT TIME AGAIN

V. RELIEF

I understand that in a Section 1983 action the Court cannot change my sentence, release me from custody or restore good time. I understand I should file a petition for a writ of habeas corpus if I desire this type of relief. DJS (please initial)

The plaintiff wants the Court to: (check those remedies you seek)

- ☒ Award money damages in the amount of \$ 750,000.00
- ☒ Grant injunctive relief by FEAR OF INJURY - IF HOUSED AT VA. BEACH CORR. CTR.
- ☒ Other PUNITIVE DAMAGES IN THE AMOUNT OF \$ 100,000.00 FOR Physical AND PHYSIOLOGICAL DAMAGES.

VI. PLACES OF INCARCERATION

Please list the institutions at which you were incarcerated during the last six months. If you were transferred during this period, list the date(s) of transfer. Provide an address for each institution.

VA. BEACH CORRECTIONAL CENTER 2501 JAMES MADISON BLD. VA. BEACH, VA. 23456, NOVEMBER 7TH 2012
NORFOLK CITY JAIL 811 E. CITY HALL AVE NORFOLK, VA. 23510, JANUARY 3RD 2013
CHES. CORR. CTR. 400 ALBEMARLE DR. CHESAPEAKE, VA. 23322, MAY 17 2011 TO PRESENT

VII. CONSENT

CONSENT TO TRIAL BY A MAGISTRATE JUDGE: The parties are advised of their right, pursuant to 28 U.S.C. § 636(c), to have a U.S. Magistrate Judge preside over a trial, with appeal to the U.S. Court of Appeals for the Fourth Circuit.

Do you consent to proceed before a U.S. Magistrate Judge: Yes [☒] No [☐]. You may consent at any time; however, an early consent is encouraged.

VIII. SIGNATURE

If there is more than one plaintiff, each plaintiff must sign for himself or herself.

Signed this 19TH day of April, 20 13.

Plaintiff x Daniel J. Goodman PRO-SE



City/County of Chesapeake
 Commonwealth of Virginia
 Sworn and subscribed before me this
 day of 4/19/13
 Witness my hand and official seal.
C. E. Earles Notary Public

6 my commission expires 7/31/14